

EXHIBIT 1

Deposition of Juan Piza-Blondet

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA :

Plaintiff :

v. :

: CIVIL NO. 98-1664 (CCC)

: CIVIL NO. 98-2344 (CCC)

33,92536 ACRES OF LAND, MORE :
OR LESS, SITUATED IN VEGA BAJA, :
COMMONWEALTH OF PUERTO RICO, :
AND JUAN PIZA BLONDET, AND :
UNKNOWN OWNERS :

Defendants :

DEPOSITION OF:

JUAN PIZA BLONDET

was taken on April 6, 2006 at the offices of CARLOS
GAZTAMBIDE & ASSOCIATES, Banco Popular Center, Suite
1515, 208 Muñoz Rivera Avenue, Hato Rey, Puerto Rico,
commencing at 1:38 p.m.

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1 recommended because we knew if we had silica sand, it's
2 a great deal to sell it, so we would be in the same
3 idea, that it would be good to sell it. I think he
4 worked more on the lot which is next to the tower and
5 the lot, he did do the plans, part of the plans of the
6 Haciendas de Tortuguero and he didn't recommend because
7 if we had sand, it's a very good deal for us.

8 Q Did you extract sand before you developed
9 Haciendas de Tortuguero on that particular site?

10 A Well, let's say we extracted sand from the
11 limit of the tower to the west. That would take maybe
12 180 acres or something acres.

13 Q Is that where the Haciendas de Tortuguero
14 Development is located?

15 A Yes, it's there. Part of that.

16 Q So your testimony is that you extracted
17 sand from the boundary of the tower property, is that
18 what I heard you say?

19 A Well, we wanted to extract sand from the tower
20 but did not think it appropriate since it was rented to
21 the government. If it had not been rented to the
22 government, we would have extracted, there's a hell of a
23 lot of sand there.

24 Q But you extracted sand from the edge of the

1 tower property all the way to the west, west meaning to
2 the edge of your property on the west, is that --

3 A On the Road 687, 687.

4 Q How much sand did you extract from that area?

5 A That was years ago. The thing is the people
6 from Owens, I talked to them because of you people and
7 now they're going to come back to the farm because they
8 need sand.

9 They said they could get the permission so I get
10 the, the, I fill in from the mountain, I've got two,
11 what do you call them, "canteras". "Canteras" is where
12 you get fill, land fill from the mountain, I got on the
13 farm or "cerro" and you put it into the, where you take
14 the sand out so we're going to examine, the only thing
15 they're paying much more now than they used to pay.

16 Q So it's your testimony that you're in the
17 process of speaking to Owens Illinois currently about
18 extracting sand from --

19 A Yes.

20 Q -- other parts of your farm, is that correct?

21 A Yes. We want to do that. It's very good deal
22 and they've got a problem, they're going to be closed if
23 they don't get sand.

24 Q Have you done the talking with Owens Illinois